

Message

From: Fong, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7DE16D76B5AE4EE7A273FF83D0C31E25-AFONG]
Sent: 10/15/2021 7:58:18 PM
To: Seto, Joanna L [joanna.seto@doh.hawaii.gov]; Ichinotsubo, Lene K [lene.ichinotsubo@doh.hawaii.gov]; Moutoux, Nicole [Moutoux.Nicole@epa.gov]; Carvalho, Gabriela [Carvalho.gabriela@epa.gov]; roxanne.kwan@doh.hawaii.gov
Subject: RE: Review: Agenda and Talking Points for AOC Party Leadership Meeting

Thanks, Joanna. We are a little concerned about overcommitting due to workload limitations and multiple decision documents already slated for Qtr 1 and 2. I've included in the talking points Qtr 2-4 if that's alright.

I'll send out the meeting invite later today. Donald will be forwarding to Navy/DLA attendees. I did share our feedback that we would have liked to see folks on camera during the last call, and he said there were technical difficulties last time and he is working with IT to get it working for the upcoming call.

Here's a clean copy of the latest talking points with those timeframes included for ease of review:

Draft Talking Points for Jeff/Kathy

- Leadership Open Remarks
 - AOC has worked to date in providing us useful information. As we have gained new information, we would like to talk about how to adapt the AOC to updated information (e.g. from AOC studies and findings, May Release) and changing priorities (e.g. secondary containment commitment). **(Kathy)**
 - Regulatory agencies are currently focusing on what we would like to see based on what was submitted in the TUA supplemental, which we'll share some key points later in the agenda. RAs have not decided the method (e.g. approval w/ conditions, disapproval, modify, additional work provisions, AOC revisions). RAs are actively working on it. **(Jeff)**
 - *PLACEHOLDER: any other points Kathy/Jeff would like to emphasize to Navy Leadership in advance of the FTAC?*
- May 6th update
 - Data collection and information sharing has been unacceptable. It undermines the Navy's credibility and trustworthiness. **(Kathy)**
- RA Update TUA Supplemental Review (Kathy/Jeff)
 - If Navy is going to commit to secondary containment or defuel as long-term goal, need to have schedule and milestones leading up to it identified. **(Jeff and Kathy)**
 - RAs and Navy need to reach agreement on release response and demonstration that what is proposed (proposed secondary containment system and release response measures) is protective of groundwater. **(Kathy)**
 - We believe the Water Treatment Plant is a necessary contingency measure, since it hasn't been shown they can prevent or contain releases. **(Jeff)**
 - TIRM: (1) should include pipelines, tunnels, other infrastructure; (2) Navy is not complying with approved TIRM schedule we want them to stick to the 20-year inspection cycle; (3) all studies and information from release events should be used to update TIRM, not just those outlined in the current SOW (i.e not just Section 3 TUA and Section 5 Corrosion and Metal Fatigue). **(Kathy)**
 - Phase 1 RVA wasn't what anyone hoped for, there is a lot of new information out there, and they should be factored in moving into Phase 2 RVA. Don't stovepipe. We need to prioritize AOC work across the sections based addressing highest risk from the facility (including pipelines, nozzles, tunnels) and what supports decision-making **(Jeff)**
- Anticipated questions from Navy/DLA
 - Question: Currently, the RAs are reviewing the GWFM, IRR, TUA Supplemental, 5.4 Execution Plan, and we are working on the RVA Phase 2 SOW. So there are 4 large topics that Navy/DLA would like to know how long the review process should take, with expected feedback.

Answer: (Red Hill Coordinators)

- GWFM & IRR: RAs have draft letters. Closer on GWFM (models are not sufficient for what they are intended to be used for and additional work needs to happen, which is not a new message and will be discussed at GWFMWG) estimated QTR 1. The IRR would be next (Capture zone not well defended). Estimated Qtr 2-4.
- TUA Supplemental: See Opening Remarks above. Estimated Qtr 2.
- 5.4 Execution Plan: Navy has not provided sufficient details that what they are proposing to do will meet objectives. DOH is ready to have them go ahead at their own risk with the understanding that (1) the Navy has already executed contracts and proceeded with the work (some of the contracts were executed before we began discussion, such as the UH contract); and (2) the DOH cannot concur with the scopes without the specific workplans for the work, which for whatever reason, the Navy has not be able to provide. EPA would like to understand how studies support Secondary Containment and if there are opportunities to prioritize. Estimated Qtr 1.
- RVA Phase 2 SOW: RAs will propose a process. Workshops Estimated Qtr 2.

Hope everyone has a great weekend!

Alison

Alison Fong

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The Region 9 Tribal Leaking UST Cleanup Program is now requesting all formal correspondence and documents electronically to this address: R9USTSubmit@epa.gov

From: Seto, Joanna L <joanna.seto@doh.hawaii.gov>

Sent: Thursday, October 14, 2021 8:08 PM

To: Fong, Alison <fong.alison@epa.gov>; Ichinotsubo, Lene K <lene.ichinotsubo@doh.hawaii.gov>; Moutoux, Nicole <Moutoux.Nicole@epa.gov>; Carvalho, Gabriela <Carvalho.gabriela@epa.gov>; roxanne.kwan@doh.hawaii.gov

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Mahalo for the colorful edits, Alison!

If asked for a tentative timeline, we are ok with sharing the schedule that you provided (but not included in the agenda). We request that the last bullet be moved up to Qtr 2. I do understand the workload challenges and we are also looking for outside assistance.

- Review and issue decisions on Navy corrosion and metal fatigue practices execution plan (Qtr 1)
- Review and issue decisions on Navy groundwater flow model report. (Qtr 1)
- Review and issue decisions on Navy release detection and tank upgrade alternatives. (Qtr 2)
- Participate in Navy risk and vulnerability assessment workshops. (Qtr 2)
- Review and issue decision on investigation of remediation of releases report. (Qtr 4 -> Qtr 2)

Mahalo!

Joanna

DOH Environmental Management Division Chief
808-586-4305 (direct work)
808-292-8408 (cell)

From: Fong, Alison <fong.alison@epa.gov>

Sent: Thursday, October 14, 2021 1:59 PM

To: Seto, Joanna L <joanna.seto@doh.hawaii.gov>; Ichinotsubo, Lene K <lene.ichinotsubo@doh.hawaii.gov>; Moutoux, Nicole <Moutoux.Nicole@epa.gov>; Carvalho, Gabriela <Carvalho.gabriela@epa.gov>; Kwan, Roxanne S <roxanne.kwan@doh.hawaii.gov>

Subject: [EXTERNAL] RE: Review: Agenda and Talking Points for AOC Party Leadership Meeting

Hi all –

Donald gave me a call and said he would be ok with the agenda as is (see strikeouts below). Please let me know if you have any further feedback on the agenda, otherwise I will send the invite out **by COB (PDT) tomorrow**.

See edits to the talking points below in purple from (1) Nicole/my review with Jeff and (2) Joanna/Nicole's check-in today. Thanks everyone for their input.

Thanks,
Alison

Alison Fong

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Email: fong.alison@epa.gov

From: Fong, Alison

Sent: Thursday, October 14, 2021 12:03 PM

To: joanna.seto@doh.hawaii.gov; Ichinotsubo, Lene K <lene.ichinotsubo@doh.hawaii.gov>; Moutoux, Nicole <Moutoux.Nicole@epa.gov>; Carvalho, Gabriela <Carvalho.gabriela@epa.gov>; roxanne.kwan@doh.hawaii.gov

Subject: RE: Review: Agenda and Talking Points for AOC Party Leadership Meeting

Hi all – Please see the attached response from Donald about the 10/25 meeting agenda. He plans to set up a separate FTAC brief to cover what they will be presenting, so are suggesting taking that off the agenda. He also asked to hear status updates on (1) AOC prioritization/updates and what the goals/next steps would be, and (2) documents that are awaiting RA's decision.

Thoughts on how to respond? I propose responding to Donald adding another agenda item in blue and let him know that a decision on the topic hasn't been made but we plan to share our current thinking and can provide status updates. For EPA, we would like to focus on content first before deciding on a method (i.e. approval w/ conditions, disapproval, modify, additional work provisions, or AOC revisions), which we expressed on 10/7 and is reflected in the Opening Remarks talking points.

Nicole/Joanna – during your check-in today perhaps you can discuss whether to include the timeframes shared yesterday in our talking points.

Thanks,
Alison

Alison Fong

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U.S. Environmental Protection Agency, Region 9
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From: Fong, Alison

Sent: Wednesday, October 13, 2021 5:01 PM

To: Seto, Joanna L <joanna.seto@doh.hawaii.gov>; Ichinotsubo, Lene K <lene.ichinotsubo@doh.hawaii.gov>; Moutoux, Nicole <Moutoux.Nicole@epa.gov>; Carvalho, Gabriela <Carvalho.gabriela@epa.gov>; roxanne.kwan@doh.hawaii.gov

Subject: RE: Review: Agenda and Talking Points for AOC Party Leadership Meeting

Hi all,

I had a chance to review with Nicole as well, edits are below in orange. Thanks everyone for the input so far, if there isn't any other input on the final agenda I will email to Donald by **COB (HST) today**.

To Joanna's question, we have the following goals for our own EPA internal fiscal year planning purposes. If there are any thoughts from HDOH about these timeframes or if we want to include them in the talking points, let us know.

- Review and issue decisions on Navy corrosion and metal fatigue practices execution plan (Qtr 1)
- Review and issue decisions on Navy groundwater flow model report. (Qtr 1)
- Review and issue decisions on Navy release detection and tank upgrade alternatives. (Qtr 2)
- Participate in Navy risk and vulnerability assessment workshops. (Qtr 2)
- Review and issue decision on investigation of remediation of releases report. (Qtr 4)

Thanks,
Alison

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From: Seto, Joanna L <joanna.seto@doh.hawaii.gov>

Sent: Wednesday, October 13, 2021 10:22 AM

To: Ichinotsubo, Lene K <lene.ichinotsubo@doh.hawaii.gov>; Fong, Alison <fong.alison@epa.gov>; Moutoux, Nicole <Moutoux.Nicole@epa.gov>; Carvalho, Gabriela <Carvalho.gabriela@epa.gov>; roxanne.kwan@doh.hawaii.gov
Subject: Re: Review: Agenda and Talking Points for AOC Party Leadership Meeting

Mahalo, Alison and Lene - Would we want to mention hard dates for submittals and responses on both sides so that we all keep to a schedule? This would put pressure on all of us, and may get us the details we keep requesting (e.g., if the deliverable does not include specific x, y, and z, the RAs will not approve).

This suggestion is to address the constant slipping of the schedules.

Mahalo,
Joanna
808-586-4305 (direct work)
808-292-8408 (c)

From: Ichinotsubo, Lene K <lene.ichinotsubo@doh.hawaii.gov>
Sent: Wednesday, October 13, 2021 7:16:46 AM
To: Fong, Alison <fong.alison@epa.gov>; Moutoux, Nicole <Moutoux.Nicole@epa.gov>; Seto, Joanna L <joanna.seto@doh.hawaii.gov>; Carvalho, Gabriela <Carvalho.gabriela@epa.gov>; Kwan, Roxanne S <roxanne.kwan@doh.hawaii.gov>
Subject: RE: Review: Agenda and Talking Points for AOC Party Leadership Meeting

Hi Alison,
Below, I offer one edit on the agenda and some clarifying language to the talking points.

Thanks,
lene

From: Fong, Alison <fong.alison@epa.gov>
Sent: Wednesday, October 13, 2021 6:59 AM
To: Ichinotsubo, Lene K <lene.ichinotsubo@doh.hawaii.gov>; Moutoux, Nicole <Moutoux.Nicole@epa.gov>; Seto, Joanna L <joanna.seto@doh.hawaii.gov>; Carvalho, Gabriela <Carvalho.gabriela@epa.gov>; Kwan, Roxanne S <roxanne.kwan@doh.hawaii.gov>
Subject: [EXTERNAL] Review: Agenda and Talking Points for AOC Party Leadership Meeting

Hi all –

As a follow-up to our 10/7 meeting, Lene and I met yesterday to finalize the agenda, identify the top items the RAs would like to convey, and start drafting talking for the 10/25 AOC Party Leadership Meeting (rescheduled from 10/18).

Donald would like a **final agenda** including any questions we would like the Navy to answer ASAP, so please review below and respond **by COB (HST) today** if you have any edits.

We can continue to work on our **talking points** leading up to the call. Please respond if you have any edits.

1. Agenda

- Leadership Open Remarks (RDML Kott, Mr. Scott, Ms. Ho)
- May 6th Update (Navy/DLA)
 - Any updates on analytical data (TPH-O) since July drinking water sample
 - Expected timeframe the final investigation will be complete and available
- GTTNA Brief (Navy/DLA)
 - Schedule

- Feasibility Study: When will RAs be able to review, any initial findings to share, preliminary designs under consideration~~considering~~
- Compliance with regulations
- Update on TUA Supplemental Review (EPA/DOH)
- ~~● Update on Section 5.4 Execution Plan, Section 8 Phase 2 RVA SOW, IRR, GWFM Review (EPA/DOH)~~
- Open Questions
 - ~~○ Are there any major talking points or updates Navy/DLA plans to share at ETAC that RAs should be aware of~~

2. Draft Talking Points for Jeff/Kathy

- Leadership Open Remarks
 - AOC has worked to date in providing us useful information. As we have gained new information, we would like to talk about how to adapt the AOC to updated information (e.g. from AOC studies and findings, May Release) and changing priorities (e.g. secondary containment commitment). (Kathy)
 - Regulatory agencies are currently focusing on what we would like to see based on what was submitted in the TUA supplemental, which we'll share some key points later in the agenda. RAs have not decided the method (e.g. approval w/ conditions, disapproval, modify, additional work provisions, AOC revisions). RAs are actively working on it. (Jeff)
 - *PLACEHOLDER: any other points Kathy/Jeff would like to emphasize to Navy Leadership in advance of the ETAC?*
- May 6th update
 - Data collection and information sharing has been ~~slow~~ unacceptable. It undermines the Navy's credibility and trustworthiness. (Kathy)
- RA Update TUA Supplemental Review
 - ~~Need to integrate the~~ If Navy is going to commit to secondary containment or defuel ~~commitment~~ as a long-term goal, need to have schedule and milestones leading up to it identified ~~must be part of the proposal~~. (Jeff and Kathy)
 - RAs and Navy need to reach agreement on release response and demonstration that what is proposed (proposed secondary containment system and release response measures) is protective of groundwater. (Kathy)
 - ~~Add~~ We believe a Water Treatment Plant ~~as a~~ is a necessary contingency measure, since it hasn't been shown that they can prevent or contain releases. (Jeff)
 - TIRM: (1) TIRM should include pipelines, tunnels, other infrastructure; (2) Navy is not complying with approved TIRM schedule we want them to stick to the 20-year inspection cycle; (3) all studies and information from release events should be used to update TIRM, not just Sections 3 TUA and Section 5 Corrosion and Metal Fatigue ~~should be updated under additional areas of AOC (including Section 8, not just Sections 3 and 5), release events, other findings~~. (Kathy)
 - Phase 1 RVA isn't what anyone hoped for, there is a lot of new information out there, and they should be factored into moving into Phase 2 RVA. Don't stovepipe. We need to prioritize AOC work across the sections based addressing highest risk from the facility (including pipelines, nozzles, tunnels) and what supports decision-making (Jeff)
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Answer (Red Hill Coordinators)
 - GWFM & IRR: RAs have draft letters. Closer on GWFM (RAs cannot accept them as is, which is not a new message and will be discussed at GWFMWG), IRR Next (Capture zone not well defended).
 - TUA Supplemental: See Opening Remarks above.
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(some of the contracts were executed before we began discussion, such as the UH contract); and (2) the DOH cannot concur with the scopes without the specific workplans for the work, which for whatever reason, the Navy has not be able to provide. EPA would like to understand how studies support Secondary Containment and if there are opportunities to prioritize.

- RVA Phase 2 SOW: RAs will propose a process.

Thanks,
Alison

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